

CARLA A. McCAULEY (State Bar No. 223910)
 carlamccauley@dwt.com
 SEAN M. SULLIVAN (State Bar No. 229104)
 seansullivan@dwt.com
 DAVIS WRIGHT TREMAINE LLP
 865 South Figueroa Street, 24th Floor
 Los Angeles, California 90017-2566
 Tel.: (213) 633-6800 Fax: (213) 633-6899

ROBERT D. BALIN (*pro hac vice*)
 robbalin@dwt.com
 LACY H. KOONCE, III (*pro hac vice*)
 lancekoonce@dwt.com
 GEORGE WUKOSON (*pro hac vice*)
 georgewukoson@dwt.com
 DAVIS WRIGHT TREMAINE LLP
 1251 Avenue of the Americas, 21st Floor
 New York, New York 10020
 Tel.: (212) 489-8230 Fax: (212) 489-8340
 ATTORNEYS FOR PLAINTIFFS

**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA**

CHINA CENTRAL TELEVISION, a China
 company; CHINA INTERNATIONAL
 COMMUNICATIONS CO., LTD., a China
 company; TVB HOLDINGS (USA), INC., a
 California corporation; and DISH
 NETWORK L.L.C., a Colorado corporation,
 Plaintiffs,

vs.

CREATE NEW TECHNOLOGY (HK)
 LIMITED, a Hong Kong company; HUA
 YANG INTERNATIONAL TECHNOLOGY
 LIMITED, a Hong Kong company;
 SHENZHEN GREATVISION NETWORK
 TECHNOLOGY CO. LTD., a China
 company; CLUB TVPAD, INC., a California
 corporation; BENNETT WONG, an
 individual, ASHA MEDIA GROUP INC.
 d/b/a TVPAD.COM, a Florida corporation;
 AMIT BHALLA, an individual;
 NEWTVPAD LTD. COMPANY d/b/a
 NEWTVPAD.COM a/k/a TVPAD USA, a
 Texas corporation; LIANGZHONG ZHOU,
 an individual; HONGHUI CHEN d/b/a E-
 DIGITAL, an individual; JOHN DOE 1 d/b/a
 BETV; JOHN DOE 2 d/b/a YUE HAI; JOHN
 DOE 3 d/b/a 516; JOHN DOE 4 d/b/a HITV;
 JOHN DOE 5 d/b/a GANG YUE; JOHN
 DOE 6 d/b/a SPORT ONLINE; JOHN DOE 7
 d/b/a GANG TAI WU XIA; and JOHN DOES
 8-10,

Defendants.

Case No.
CV 15-1869 SVW (AJWx)

**REQUEST TO ENTER
 DEFAULT AGAINST
 DEFENDANT ASHA MEDIA
 GROUP, INC.;
 DECLARATIONS OF SEAN M.
 SULLIVAN WITH EXHIBITS A
 TO B**

Judge: Hon. Stephen V. Wilson

Complaint Filed: March 13, 2015

**TO THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE
CENTRAL DISTRICT OF CALIFORNIA:**

Plaintiffs China Central Television, China International Communications Co., Ltd., TVB Holdings (USA), Inc., and DISH Network L.L.C. (collectively “Plaintiffs”) request that the Clerk of the above-entitled Court enter default in this matter against Defendant Asha Media Group, Inc. (“Asha Media”) pursuant to Federal Rule of Civil Procedure 55(a). This request is made on the grounds that because Asha Media failed to retain new counsel to represent it within the time prescribed by this Court in its May 19, 2016 Order Re Plaintiff’s Request to Strike Answer [Dkt. No. 191] its answer has been stricken, and Asha Media has failed to otherwise plead or defend this action. *See* Declaration of Sean M. Sullivan (“Sullivan Decl.”) at ¶¶ 5-8.

Plaintiffs filed the instant action on March 13, 2015. [Dkt. No. 1.] Plaintiffs served Asha Media with the complaint on March 19, 2015 [Dkt. No. 42; Sullivan Decl. ¶ 3, Ex. A], and on April 23, 2015, Defendants Asha Media and Amit Bhalla jointly filed an answer to the complaint [Dkt. No. 58]. On April 12, 2016, counsel for Asha Media and Amit Bhalla, the law firm of Traverso Legal, PLC and Law Office of Andrianos Facchetti, filed a motion to withdraw as counsel for both Asha Media and Amit Bhalla. [Dkt. No. 186.] Plaintiffs did not oppose that motion, but requested that if the Court were to grant the motion, it strike the answer filed by Asha Media and Amit Bhalla as to Asha Media. [Dkt. No. 188.] The Court granted the motion to withdraw on May 16, 2016. [Dkt. No. 190.]

On May 19, 2016, the Court issued a Minute Order stating that Asha Media and Amit Bhalla had twenty-one (21) days to retain new counsel, or their answer would be stricken. [Dkt. No. 191.] In light of the withdrawal of their counsel, the Court ordered former counsel for Asha Media and Amit Bhalla, Mr. Facchetti, to give notice of the Court’s Order to Asha Media and Amit Bhalla. [*Id.*] Because Mr. Facchetti had been removed from the Court’s docket and e-service list prior to the

1 issuance of the May 19 Order, counsel for Plaintiffs served the Court's Order via e-
 2 mail on Mr. Facchetti, who in turn acknowledged receipt of the email and Order. *See*
 3 Sullivan Decl. ¶ 7; Ex. B.

4 As of the date of this request for entry of default, neither Asha Media nor Amit
 5 Bhalla have notified the Court that they have retained new counsel. *See* Sullivan
 6 Decl. ¶ 8. Accordingly, pursuant to the terms of the Court's May 19 Order, their
 7 answer is stricken and neither defendant has an operative response to Plaintiffs'
 8 complaint on file in this action.

9 Accordingly, because Asha Media has failed to otherwise plead or defend this
 10 action, and as Asha Media is not a minor, an incompetent person or a person whose
 11 waiver has been filed (*See* Fed. R. Civ. P. 4(f); *see also* Sullivan Decl. ¶ 9), Plaintiffs
 12 respectfully request that default be entered against Asha Media.

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 14 DATED: July 6, 2016

DAVIS WRIGHT TREMAINE LLP
 CARLA A. McCAULEY
 SEAN M. SULLIVAN
 ROBERT D. BALIN (*pro hac vice*)
 LACY H. KOONCE, III (*pro hac vice*)
 GEORGE WUKOSON (*pro hac vice*)

18 By: /s/Sean M. Sullivan
 19 Sean M. Sullivan

20 Attorneys for Plaintiffs

DECLARATION OF SEAN M. SULLIVAN

I, Sean M. Sullivan, declare as follows:

1. I am licensed to practice law before all the courts in the State of California and before this Court. I am Counsel at the firm of Davis Wright Tremain LLP, counsel for Plaintiffs China Central Television, China International Communications Co., Ltd., TVB Holdings (USA), Inc., and DISH Network L.L.C. (collectively “Plaintiffs”) in the above-entitled matter. I submit this Declaration in support of Plaintiffs’ Request for Entry of Default. I have personal knowledge of the facts contained herein, and, if called upon as a witness, I could and would testify competently about these facts, except for those matters stated expressly upon information and belief, which matters are believed to be true.

2. On or about March 13, 2015, Plaintiffs filed the complaint in this action [Dkt. No. 1].

3. On or about March 19, 2015, Plaintiffs served the complaint on Asha Media Group, Inc. (“Asha Media”). A true and correct copy of the Proof of Service filed with this Court as Docket No. 42 is attached hereto as **Exhibit A**.

4. On or about April 23, 2015, Asha Media and Defendant Amit Bhalla jointly filed an answer to the complaint [Dkt. No. 58].

5. On or about April 12, 2016, counsel for Asha Media and Amit Bhalla, the law firm of Travers Legal, PLC and Law Office of Andrianos Facchetti, filed a motion to withdraw as counsel for both Asha Media and Amit Bhalla [Dkt. No. 186]. Plaintiffs did not oppose that motion, but requested that if the Court were to grant the motion, it strike the answer filed by Asha Media and Amit Bhalla as to Asha Media [Dkt. No. 188]. On or about May 16, 2016, the Court granted the motion to withdraw on May 16, 2016 [Dkt. No. 190].

6. On or about May 19, 2016, the Court issued a Minute Order stating that Asha Media and Amit Bhalla had twenty-one (21) days to retain new counsel, or their answer would be stricken [Dkt. No. 191]. In light of the withdrawal of their

1 counsel, the Court ordered former counsel for Asha Media and Amit Bhalla, Mr.
2 Facchetti, to give notice of the Court's Order to Asha Media and Amit Bhalla.

3 7. Because Mr. Facchetti had been removed from the Court's docket and e-
4 service list prior to the issuance of the May 19 Order, on May 20, 2016, I sent Mr.
5 Facchetti an email attaching the Court's May 19 Order. Mr. Facchetti responded that
6 same day, acknowledged receipt of my email. True and correct copies of my email
7 to Mr. Facchetti and his response are attached hereto as **Exhibit B**.

8 8. To date, neither Asha Media or Amit Bhalla have notified the Court or
9 counsel for Plaintiffs of their selection of new counsel to represent them in this
10 matter.

11 9. Asha Media is a corporation organized under the laws of Florida, and
12 not a minor or incompetent person, or a person whose waiver has been filed.

13 I declare under penalty of perjury under the laws of the United States of
14 America that the foregoing is true and correct.

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16 Executed July 6, 2016 at Los Angeles, California.

17 /s Sean M. Sullivan
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